

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

UNITED STATES OF AMERICA	)	CRIMINAL NO. 3:22-cr-726-SAL
	)	18 U.S.C. § 2
	)	18 U.S.C. § 922(g)(1)
	)	18 U.S.C. § 924(a)(2)
	)	18 U.S.C. § 924(d)(1)
	)	18 U.S.C. § 924(e)
v.	)	18 U.S.C. § 1512(b)(3)
	)	18 U.S.C. § 981(a)(1)(C)
	)	18 U.S.C. § 1591(a)(1)
	)	18 U.S.C. § 1591(b)(1)
	)	18 U.S.C. § 1591(e)(2)
	)	18 U.S.C. § 1594(c)
	)	18 U.S.C. § 1594(d)(1)
ERIC RASHUN JONES,	)	18 U.S.C. § 1594(d)(2)
a/k/a “E Dolla,”	)	28 U.S.C. § 2461(c)
a/k/a “E,”	)	
BRITTANY DANIELLE CROMER	)	<u><b>SEALED SUPERSEDING INDICTMENT</b></u>

COUNT 1

(Felon in Possession of a Firearm and Ammunition)

THE GRAND JURY CHARGES:

That on or about June 25, 2019, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly possessed a firearm and ammunition in and affecting commerce, to wit, a Springfield, model XD, 9mm pistol and 9mm ammunition, having previously been convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime; before **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** committed the offense charged in this count, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** had at least three previous convictions for offenses committed on occasions different from one another.

In violation of Title 18, United States Code. Sections 922(g)(1), 924(a)(2), and 924(e).

COUNT 2

(Human Trafficking Conspiracy)

## THE GRAND JURY FURTHER CHARGES:

That beginning at a date unknown to the Grand Jury, but from at least in or about August 2018, and continuing thereafter, up to and including the date of this Superseding Indictment, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** and **BRITTANY DANIELLE CROMER**, knowingly in and affecting interstate commerce, did combine, conspire, confederate, agree and have a tacit understanding with each other and with others both known and unknown to the Grand Jury, to recruit, entice, harbor, transport, provide, obtain, advertise, solicit, patronize, and maintain by any means, a person, and to benefit financially by receiving anything of value from participation in a venture which has recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, solicited, and maintained a person, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and any combination of such means would be used to cause a person to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(1);

All in violation of Title 18, United States Code, Section 1594(c).

Manner and Means

1. It was part of the conspiracy that one or more of the conspirators recruited victims to work in commercial sex for the benefit of one or more of the conspirators.
2. It was further part of the conspiracy that one or more of the conspirators would take and obtain pictures of victims and place online advertisements consistent with the commercial sex trade.
3. It was further part of the conspiracy that one or more of the conspirators would communicate with customers to facilitate and arrange commercial sex acts.

4. It was further part of the conspiracy that one or more of the conspirators would obtain proceeds from the commercial sex acts from the victims and customers.

5. It was further part of the conspiracy that one or more of the conspirators would provide transportation for the victims to locations where the commercial sex acts would take place.

6. It was further part of the conspiracy that one or more of the conspirators would exercise supervision, violence, and control over the victims who engaged in the commercial sex acts.

7. It was further part of the conspiracy that one or more of the conspirators would use vehicles, public highways, hotels, telephones, the internet, and internet-based mobile applications to facilitate the commercial sex acts.

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 3

(Sex Trafficking by Force, Fraud, or Coercion)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in or around August 2018 through on or about June 10, 2021, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly and in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 1, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 1 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 4

(Sex Trafficking by Force, Fraud, or Coercion)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in or around March 2019, through on or about June 24, 2019, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly and in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 2, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 2 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 5

(Sex Trafficking by Force, Fraud, or Coercion)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in or around October 2020, through in or around November 2020, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly and in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 3, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 3 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 6

(Sex Trafficking by Force, Fraud, or Coercion)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in or around January 2021, through in or around January 2022, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly and in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 4, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 4 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).

COUNT 7

(Sex Trafficking by Force, Fraud, or Coercion)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least on or about February 11, 2022, through on or about March 21, 2022, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly and in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 5, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 5 to engage in a commercial sex act.

In violation of Title 18, United States Code, Sections 1591(a)(1) and 1591(b)(1).



COUNT 8

(Witness Tampering)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least in or around August 2018, through in or around December 2018, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly used intimidation, threatened, and corruptly persuaded another person, and attempted to do so, and engaged in misleading conduct toward another person, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission or possible commission of Federal offenses, to wit, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** instructed Victim 1 to not talk to federal law enforcement agents investigating **ERIC RASHUN JONES’s, a/k/a “E Dolla,” a/k/a “E,”** involvement in a Human Trafficking Conspiracy and Sex Trafficking by Force, Fraud, or Coercion.

In violation of Title 18, United States Code, Section 1512(b)(3).

COUNT 9

(Witness Tampering and Aiding/Abetting)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least on or about June 26, 2019, through on or about July 1, 2019, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly used intimidation, threatened, and corruptly persuaded another person, and attempted to do so, and engaged in misleading conduct toward another person, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission or possible commission of Federal offenses, to wit, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** instructed Victim 2 to not talk to federal law enforcement agents investigating **ERIC RASHUN JONES’s, a/k/a “E Dolla,” a/k/a “E,”** involvement in being a Felon in Possession of a Firearm, a Human Trafficking Conspiracy, and Sex Trafficking by Force, Fraud, or Coercion, and did aid and abet others known and unknown to the Grand Jury in the commission of the aforementioned offense;

In violation of Title 18, United States Code, Section 1512(b)(3) and 2.

COUNT 10

(Witness Tampering)

THE GRAND JURY FURTHER CHARGES:

That beginning at a time unknown to the Grand Jury, but at least on or about August 19, 2022 through on or about November 1, 2022, in the District of South Carolina, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** knowingly used intimidation, threatened, and corruptly persuaded another person, and attempted to do so, and engaged in misleading conduct toward another person, with intent to hinder, delay, and prevent the communication to a law enforcement officer of the United States of information relating to the commission or possible commission of Federal offenses, to wit, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** instructed another individual, Witness 1, to not talk to federal law enforcement agents investigating **ERIC RASHUN JONES’s, a/k/a “E Dolla,” a/k/a “E,”** involvement in a Human Trafficking Conspiracy and Sex Trafficking by Force, Fraud, or Coercion.

In violation of Title 18, United States Code, Section 1512(b)(3).

FORFEITUREPEONAGE AND SLAVERY:

Upon conviction for violations of Title 18, United States Code, Sections 1591 and 1594 as charged in this Superseding Indictment, the Defendants, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** and **BRITTANY DANIELLE CROMER**, shall forfeit to the United States any property used or intended to be used, in any manner or part, to commit or facilitate the commission of the offenses, and any property, real or personal, which constitutes, is traceable, or is derived from proceeds the Defendants obtained, directly or indirectly, as the result of such violations.

WITNESS TAMPERING:

Upon conviction for violations of Title 18, United States Code, Section 1512 as charged in this Superseding Indictment, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** shall forfeit to the United States any property, real or personal, which constitutes, is traceable, or is derived from any proceeds the Defendant obtained, directly or indirectly, as the result of such violations.

FIREARM OFFENSE:

Upon conviction for the felony violation of Title 18, United States Code, Section 922(g)(1) as charged in this Superseding Indictment, the Defendant, **ERIC RASHUN JONES, a/k/a “E Dolla,” a/k/a “E,”** shall forfeit to the United States all of the Defendant’s rights, title, and interest in:

- (a) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
  - (1) involved in or used in any knowing violations of 18 U.S.C. § 922, or violation of any other criminal law of the United States, or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and 1594(d)(1) and (2), and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Superseding Indictment includes, but is not limited to, the following:

A. Firearm:

Springfield, model XD, 9mm pistol  
Serial Number: HG931978  
Seized from: Eric Rashun Jones

B. Ammunition:

Miscellaneous rounds of 9mm ammunition  
Seized from: Eric Rashun Jones

C. Jewelry:

(2) chains, (1) bracelet, (1) 10KT yellow gold pendant, and (1) 10KT gold tooth bridge  
Seized from: Eric Rashun Jones  
Asset ID: 22-FBI-003297

D. Cash/United States Currency:

\$568.40 in United States currency  
Seized from: Eric Rashun Jones

E. Electronic Equipment:

- (1) Silver Apple MacBook Air  
Serial Number: C17N352DG083
- (2) Black Samsung Cell Phone  
IMEI 350207639512877
- (3) Grey T-Mobile Cell Phone  
IMEI 863892053692113
- (4) Apple iPhone  
Serial Number: FFWGT5YN0DXP

- (5) Apple iPhone  
Serial Number: F9G5JPW7DN
- (6) Apple iPhone  
Serial Number: F17GTEA60DXP
- (7) Black Verizon Ellipsis tablet  
Model Number: QTAIR7  
Serial Number: Unknown
- (8) Black Kurio tablet  
Model Number: Unknown  
Serial Number: Unknown

F. Proceeds/Forfeiture Judgment:

A sum of money equal to all proceeds the Defendants obtained, directly or indirectly, from the offenses charged in this Superseding Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to their violations of Title 18.


SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture to the United States, as a result of any act or omission of the Defendants,

- (1) Cannot be located upon the exercise of due diligence;
- (2) Has been transferred or sold to, or deposited with a third party;
- (3) Has been placed beyond the jurisdiction of the Court;
- (4) Has been substantially diminished in value; or
- (5) Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1), [incorporating Title 21, United States Code, Section 853(p)], to seek forfeiture of any other property of the said Defendants up to the value of the above forfeitable property.

Pursuant to Title 18, United States Code, Sections 924(d)(1), 981(a)(1)(C) and 1594(d)(1) and (2), and Title 28, United States Code, Section 2461(c).

A Tne BILL  
  
FOREPERSON

ADAIR F. BOROUGHS  
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